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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

SEAN GOSSMAN

Case: 2:13-mj-30303

Judge: Unassigned,

Filed: 05-15-2013 At 03:11 PM

CMP: USA v GOSSMAN (FMM)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 12, 2012 through April 5, 2013 in the county of Lenawee in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

2252A(a)(2) and (a)(5)(b)

*Offense Description*

Receipt and Possession of Child Pornography


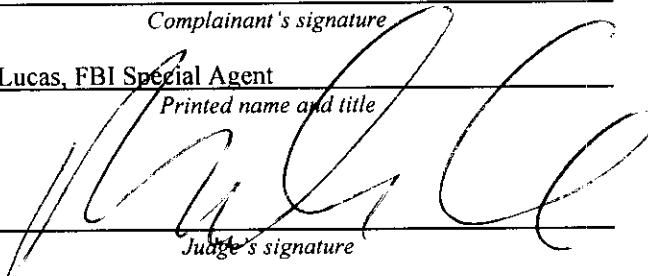
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: May 15, 2013

City and state: Detroit, MI

  
\_\_\_\_\_  
*Complainant's signature*  
Susan Lucas, FBI Special Agent  
\_\_\_\_\_  
*Printed name and title*  
  
\_\_\_\_\_  
*Judge's signature*  
Mark A. Randon, United States Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT**

I, Susan Lucas, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. Affiant has been employed as a Special Agent of the FBI since 1996 and is currently assigned to the Ann Arbor RA and the Southeast Michigan Crimes Against Children Task Force (SEMCAC). SEMCAC investigates violations of federal law including receipt, possession and distribution of child pornography. Affiant gained experience to conduct such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies.

2. As a federal agent, Affiant is authorized to investigate violations of United States laws and execute warrants issued under the authority of the United States.

**I. INTRODUCTION**

3. Affiant is familiar with the federal definition of “child pornography” set forth in Title 18, United States Code, Section 2256(8).

4. This affidavit is submitted in support of a criminal complaint charging Sean Gossman with receipt and possession of child pornography in violation of Title 18, United States Code, Sections 2252(a)(2) and (a)(5)(B).

5. The information supplied in this affidavit is based upon Affiant’s investigation and that of Affiant’s agency, including the execution of a search warrant at a residence within the Sterling Estates Mobile Home Park located in Adrian, Michigan, Eastern District of Michigan. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, Affiant has not set forth every fact related to, or otherwise the product of, this investigation.

## II. THE INVESTIGATION

6. On November 10, 2012, a juvenile found a thumb drive on the ground while in Onsted Village Park located in Onsted, Michigan. A family member of the juvenile turned the thumb drive over to the Cambridge Township Police. The police conducted a review of the thumb drive to determine the rightful owner. During the review, the police found images depicting child pornography on the thumb drive. Additionally the police found pictures of the defendant, Sean Gossman.

7. An FBI preliminary computer forensic examination of the thumb drive was completed on or about March 19, 2013. The computer forensic examiner identified 21 non-pornographic photos of Gossman, taken with a Motorola C.451.01.04.17.08 2.0 Megapixel camera. This particular camera is a cell phone camera built into a cell phone.

8. The forensic examiner found 1,039 images of child pornography on the thumb drive. In total, there were 28 images depicting child pornography including images depicting bondage or torture, five child pornographic movies greater than five minutes long, five movies less than five minutes long, one movie including CP and bestiality, and 536 images of child erotica.

9. One of the child pornographic images depicted an infant with a bag over her head and a rope around her neck. The child appeared deceased and the words “nepi-rape” was written on her stomach. An Internet search revealed that “nepi-rape” is defined as “the rape of innocence.”

10. Lastly, the computer forensic examiner found “Tor Browser” on the thumb drive. “Tor” software protects users' online privacy by bouncing their communications around a network of relay computers. By doing so, Tor masks the user's IP address which could otherwise

be used to identify a user. Tor also prevents someone, attempting to monitor an Internet connection, from learning what sites a user visits, prevents the sites the user visits from learning the user's physical location, and lets the user access sites which could otherwise be blocked.

11. On April 5, 2013, Gossman was a defendant in a show cause hearing at the Lenawee County Courthouse. At the hearing, Gossman confirmed he was staying at a trailer within the Sterling Estates Mobile Home Park in Adrian, Michigan. Surveillance thereafter determined that Gossman walked to that trailer immediately after the court hearing.

12. On April 5, 2013, based on the forgoing, Affiant obtained a search warrant for the trailer, identified above, to search for evidence of violations of Title 18, United States Code, Section 2252A (receipt and possession of child pornography). The warrant was executed on April 5, 2013 at approximately 1:30PM. Gossman was present at the home when the warrant was executed. The agents seized two laptops, several CD/DVDs, and three thumb drives.

13. Gossman was advised of his Miranda Rights. Gossman stated that he understood and waived his rights. In summary, Gossman indicated that all of the above described thumb drives belonged to him and that he has been searching for and downloading child pornography. Gossman admitted that he started downloading child erotica, moved onto child pornographic images, and most recently downloaded child pornographic movies and video clips. Gossman stated that the child pornography was his and his alone.

14. On April 11, 2013, a preliminary forensic exam was conducted on the items seized from the search warrant. The following are examples of what was found during the preliminary forensic examination:

- a. An image that depicted a minor child, under the age of 10, performing oral sex on an adult male. This is a close up picture with an erect penis entering the child's mouth;
- b. An image that depicted a minor female, approximately 8-10 years-old, wearing a white tutu with her legs spread. One leg is up and the other is on the floor. The picture shows the child's genitals; and
- c. An image that depicted two minor females, approximately 10 years old, on a couch with their heads on the seat. The children are naked with their buttocks in the air and their genitals exposed.

15. On May 14, 2013 Joanne Jenkins reported to law enforcement that her friend had just told her that Gossman had shown pornographic images to Jenkins' son, who is 14 years old.

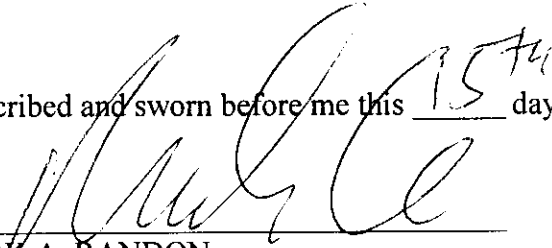
16. Also on May 14, 2013 local a law enforcement officer reported that Gossman had recently spoken about leaving Michigan and heading to California.

17. Based on the facts, as stated above, there is probable cause to believe that from October 12, 2012 through April 5, 2013, Gossman did knowingly receive and possess materials that contained images of child pornography as defined in Title 18, United States Code, Section 2256(8). The child pornography was acquired through a means and facility of interstate and foreign commerce, the Internet. Gossman claimed ownership of all the thumb drives in which were stored CP images. The child pornography had also been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer and were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2252A(a)(2) and (a)(5)(B).



Susan Lucas, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me this 15<sup>th</sup> day of April 2013.



MARK A. RANDON  
UNITED STATES MAGISTRATE JUDGE